

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

In re KOSMOS ENERGY LTD SECURITIES § Consolidated Civil Action No. 3:12-cv-373-B
LITIGATION §

§ CLASS ACTION

This Document Relates To: §

ALL ACTIONS. §
_____ §

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

PLEASE TAKE NOTICE THAT the parties have entered into a Stipulation of Settlement (“Stipulation”) in this action. In accordance with the Stipulation, Defendants Kosmos Energy Ltd., Brian F. Maxted, W. Greg Dunlevy, Sylvia Manor, John R. Kemp III, David I. Foley, Jeffrey A. Harris, David B. Krieger, Prakash A. Melwani, Adebayo O. Ogunlesi, Chris Tong, and Christopher A. Wright, Citigroup Global Markets Inc., Barclays Capital Inc., Credit Suisse Securities (USA) LLC, BNP Paribas Securities Corp., SG Americas Securities LLC, Credit Agricole Securities (USA) Inc., Scotia Capital (USA) Inc. (f/k/a Howard Weil Incorporated), HSBC Securities (USA) Inc., Jefferies & Company, Inc., Natixis Securities Americas LLC (f/k/a Natixis Bleichroeder LLC), and RBC Capital Markets LLC (collectively, “Defendants”), Lead Plaintiff Nursing Homes and Related Industries Pension Plan and plaintiff George M. Mounger (collectively, “Plaintiffs”) hereby move the Court for an order:

- (a) granting preliminary approval of the proposed Settlement;
- (b) certifying a class for settlement purposes;
- (c) approving the parties’ proposed form and method for giving notice of the pendency of this action and the Settlement to the Settlement Class;
- (d) directing that the notice be given to Settlement Class Members as approved by the Court; and
- (e) scheduling a Final Approval Hearing at which the Court will determine whether:
 - (i) the proposed Settlement of the Litigation on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to the Settlement Class and merits the Court’s approval;

(ii) a Judgment as provided in ¶1.11 of the Stipulation should be entered;
and

(iii) the payment of Lead Plaintiffs' counsel's attorneys' fees and expenses as provided for in the Stipulation should be approved.

This Joint Motion is based on the Stipulation of Settlement dated April 28, 2014, Plaintiffs' Memorandum of Law and Declarations filed in connection with this motion, all other pleadings and matters of record, and such additional evidence or argument as may be presented.

DATED: April 28, 2014

SUSMAN GODFREY LLP
DANIEL H. CHAREST



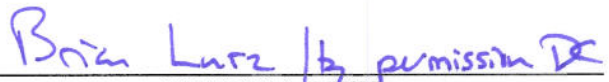
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DATED: April 28, 2014

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- 2 -

JOINT MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT

DATED: April 28, 2014

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